

REMARKS

Claims 40-79 were pending and presented for examination in this application. In an Office Action dated July 21st 2007, claims 40-79 were rejected.

Claims 40-49, 51, 57-64, and 69-75 are amended. Claims 80-83 are newly added. In making these amendments, Applicants do not concede that the subject matter of such claims was in fact disclosed or taught by the cited prior art. Rather, Applicants reserve the right to pursue such protection at a later point in time and merely seek to pursue protection for the subject matter presented in this submission.

Summary of Interview

Applicants thank Examiner Al-Hashemi for granting a telephone interview on November 5th, 2008. During this interview, the rejection of claims 40-79 under 35 U.S.C. 102(e) under Subramanian was discussed. Specifically, the Examiner provided further explanation of her construction of the claimed invention based on the cited reference. Based on this discussion, the undersigned representative proposed limitations to the claims which would further distinguish the claimed invention over Subramaniam.

Response to Rejection Under 35 USC § 102

In the Section entitled “Claim Rejections – 35 USC 102”, the Examiner rejects claims 40-79 as allegedly being anticipated by Subramaniam et al. (US Patent Application Publication No. 2007/0208697). This rejection is respectfully traversed.

As discussed with the Examiner, the claimed invention is directed to a method of generating implicit search queries based in part on monitoring real-time user input to a client device. A plurality of events is identified responsive to monitoring the real-time user

interactions. A plurality of user-context attributes are identified based at least in part on the plurality of events, wherein the plurality of user-context attributes indicate aspects of the real-time user interactions. A plurality of implicit search queries comprising comprised of terms are generated, wherein the terms are based at least in part on the plurality of user-context attributes. A plurality of search results generated responsive to the plurality of implicit search queries are received and a display of search results is updated responsive to receiving the plurality of search results.

As suggested by the Examiner, claims 40, 57 and 69 have been amended to clarify that the search queries are implicit search queries. Claims 40, 57 and 69 have been further amended to clarify that the events are identified responsive to monitoring real-time user interactions with the client device and that the user-content attributes indicate aspects of the real-time user interactions. Claim 40, in relevant part, recites:

identifying a plurality of events responsive to monitoring **real-time** user interactions with a client device;
identifying a plurality of user-context attributes based at least in part on the plurality of events, **wherein the plurality of user-context attributes indicate aspects of the real-time user interactions with the client device**;
generating a plurality of **implicit** search queries comprising terms, wherein the terms are based at least in part on the plurality of user-context attributes;
receiving a plurality of search results generated responsive to the plurality of implicit search queries; and
updating a display of search results responsive to receiving the plurality of search results.

Subramaniam does not teach or disclose these elements. Subramaniam is a method of indexing multiple databases and files to allow searching across the databases and files using a single search.

Specifically, Subramaniam does not disclose both “identifying a plurality of events responsive to monitoring **real-time** user interactions with a client device” and “identifying a

plurality of user-context attributes based at least in part on the plurality of events, **wherein the plurality of user-context attributes indicate aspects of the real-time user interactions with the client device.**”

During the telephone interview, the Examiner provided explanation of her mapping of Subramaniam to the claimed invention, stating that the section of Subramaniam which discloses storing histories of searches corresponded to “identifying a plurality of events responsive to monitoring user input to client device.” The amended claims recite “identifying a plurality of events responsive to monitoring **real-time user interactions** with a client device.” Histories of previous searches do not correspond to **real-time** user interactions, as the histories are stored in memory and are not received in real-time, as claimed. Therefore, Subramaniam fails to disclose this element.

Further, Subramaniam fails to disclose “identifying a plurality of user-context attributes based at least in part on the plurality of events, wherein the plurality of user-context attributes indicate aspects of the real-time user interactions with the client device.” Assuming *in arguendo* that the user search histories identified in Subramaniam correspond to “real-time user interactions”, there is no second step by which information that corresponds to “user-content attributes” is identified based on the histories of user searches. Further, the histories of user searches taught by Subramaniam do not indicate “aspects of the real-time user interactions with the client device”, as claimed.

Accordingly, Applicants submit claim 40 is patentably distinguishable over Subramaniam. Claims 57 and 69 also contain elements reciting the identification of “a plurality of events responsive to monitoring user input to client device” and “a plurality of user-context attributes based at least in part on the plurality of events, wherein the plurality of

user-context attributes indicate aspects of the real-time user interactions with the client device” and are patentably distinguishable over the cited art for at least the same reasons. Claims 41-56, 58-58 and 70-83 depend from claims 40, 57 and 69 and are patentably distinguishable for at least the same reasons

Conclusion

In sum, Applicants respectfully submit that the pending claims 40-83 are patentably distinguishable over the cited reference.

In addition, Applicants respectfully invite Examiner to contact Applicants’ representative at the number provided below if Examiner believes it will help expedite furtherance of this application.

Respectfully Submitted,

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